

From: [Bloomberg, Jon H](#)
To: [Jacobson, Linda](#); [McCarter, Jennifer](#); [Bailey, Treasure](#); [Figur, Charles \(he/him\)](#)
Subject: RE: follow up to discussion this morning of paragraphs 81 and 95 (c) of the draft Consent Agreement for Comanche Station
Date: Monday, May 2, 2022 12:23:41 PM

Thanks, Linda, to you and Treasure for your time as well.

Based on our discussion, I propose the following language for paragraph 95 .c.:

Our original proposal:

require installation and use of dedicated pumps for sampling in all groundwater monitoring wells, except those wells that typically do not produce water, used in the detection and assessment monitoring programs due to the low yield and high suspended solids in many wells developed in the weathered shale,

Our revised proposal:

require installation and use of dedicated pumps for sampling in all groundwater monitoring wells, except those wells used for monitoring water level only, used in the detection and assessment monitoring programs due to the low yield and high suspended solids in many wells developed in the weathered shale,

Please let us know if this works or if we need further discussion.

Thanks again.

Jon

From: Jacobson, Linda <Jacobson.Linda@epa.gov>
Sent: Monday, May 2, 2022 12:26 PM
To: McCarter, Jennifer <jennifer.mccarter@xcelenergy.com>; Bloomberg, Jon H <Jon.H.Bloomberg@xcelenergy.com>; Bailey, Treasure <Bailey.Treasure@epa.gov>; Figur, Charles (he/him) <Figur.Charles@epa.gov>
Subject: follow up to discussion this morning of paragraphs 81 and 95 (c) of the draft Consent Agreement for Comanche Station

EXTERNAL - STOP & THINK before opening links and attachments.

Jennifer and Jon,

Thank you again for your time this morning. We had discussed two matters: the approval/disapproval of consultants and laboratories as outlined in paragraph 81 and the installation of dedicated pumps in wells used in the detection and assessment monitoring network as described in paragraph 95 (c). A copy of the referenced Consent Agreement is attached.

As we discussed, we appreciate your sharing your list of proposed consultants and labs with us, a copy of which is attached to this email. EPA does not intend to disapprove any of the consultants or labs listed on your submission. We do note that we have had concerns with the accuracy and completeness of some of your past determinations and documents posted to either the publicly accessible website or submitted to Region 8. We wished to emphasize that the intent of the approval language is to help ensure that your company hires qualified professionals who produce work products at the level that we need. Due to past concerns and although we will not be issuing a disapproval at this time, we will be initially scrutinizing future required submittals closely.

On the second point, we understand that Jon will be crafting language clarifying that dedicated pumps will not be installed in wells monitored only for water levels. Jennifer will be submitting a list of those wells for which dedicated pumps will not be installed as well as additional details on those wells. She will also clarify what is meant by “typically” or “usually” dry.

Thank you, again.

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